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DEC 14 2021

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA, ) I N D I C T M E N T  
)  
Plaintiff, )  
)  
v. )  
)  
CHARLES LYNN, aka CHARLIE, aka )  
CHARLIE HUSTLE; )  
JAIME ENGLAND; )  
DAJUAN GRANT, aka TY, aka TYG; )  
ISAIAH CARSON, aka ZEEK; )  
ZAILY MARTINEZ-NAVARRO; )  
ALEXIS SHORT; )  
TAMAR EVANS, aka HEAD; )  
DARIUS RICHARD; )  
MICHAEL TAYLOR; )  
TERRY MATTHEWS; )  
TY MAREJRYC GEFFERI KEMAR )  
HALL; )  
Defendants. )  
)  
CASE NO.: 1:21 CR 866  
Title 21, United States Code,  
Sections 841(a)(1),  
(b)(1)(A), (b)(1)(B),  
(b)(1)(C), 843(b), and 846

JUDGE LIOI

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute, 21 U.S.C. § 846)

The Grand Jury charges:

1. From on or around May 1, 2021 to on or about November 18, 2021, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants CHARLES LYNN, aka CHARLIE, aka CHARLIE HUSTLE; JAIME ENGLAND; DAJUAN GRANT, aka TY, aka TYG; ISAIAH CARSON, aka ZEEK; ZAILY MARTINEZ-NAVARRO; ALEXIS SHORT; TAMAR EVANS, aka HEAD; DARIUS RICHARD; MICHAEL TAYLOR; TERRY MATTHEWS; and TY MAREJRYC GEFFERI KEMAR HALL did knowingly and intentionally combine, conspire, confederate, and agree together and with each other and with diverse others

known and unknown to the Grand Jury, to distribute and possess with intent to distribute the following: 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; and 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine; in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), (b)(1)(B), and (b)(1)(C).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that:
  - a. JAIME ENGLAND supplied CHARLES LYNN with counterfeit fentanyl pills branded as 30 milligram oxycodone pills for redistribution in the Northern District of Ohio.
  - b. LYNN instructed ZAILY MARTINEZ-NAVARRO, ALEXIS SHORT, and others how to execute drug trafficking activities in the Northern District of Ohio.
  - c. LYNN distributed controlled substances to DAJUAN GRANT, ISAIAH CARSON, TAMAR EVANS, DARIUS RICHARD, MICHAEL TAYLOR, TERRY MATTHEWS, TY MAREJRYC GEFFERI KEMAR HALL, and others for redistribution in the Northern District of Ohio.
  - d. Conspirators used multiple telephones to conduct drug trafficking activity by making and receiving telephone calls and sending and receiving text messages. To reduce the risk of being detected by law enforcement, and to conceal the identity of the person using the device, co-conspirators often used cellular telephones that had been obtained in the names of other persons or in fictitious names.
  - e. Conspirators, when using cellular telephones or text messaging to conduct drug trafficking activity, used slang terms, street terminology, and code words and phrases for controlled substances to obscure and disguise the true nature of their activities and the true

meaning of their conversations.

ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance thereof, and to effect and conceal the existence of the conspiracy, the Defendants and others performed acts in the Northern District of Ohio and elsewhere, including but not limited to the following:

3. On March 13, 2021, while incarcerated, CHARLES LYNN called TY MAREJRYC GEFFERI KEMAR HALL on the telephone. During the call, LYNN, in sum and substance, explained to HALL how to conceal narcotics in toys to transport the narcotics and advised HALL how frequently HALL should change his phone number.

4. On April 9, 2021, HALL tracked a parcel mailed to 54xx Gary Avenue, Bedford, Ohio.

5. On April 26, 2021, HALL tracked a parcel mailed to 18xx East 93rd Street, Cleveland, Ohio.

6. On April 28, 2021, HALL tracked parcels mailed to 54xx Gary Avenue, Bedford, Ohio, and 18xx East 93<sup>rd</sup> Street, Cleveland, Ohio.

7. On June 16, 2021, a USPS Priority Mail parcel (Parcel-1) containing 1102.88 grams of fentanyl branded as 30 milligram oxycodone tablets was mailed from Phoenix, Arizona to 54xx Gary Avenue, Bedford, Ohio. The tablets were contained in 10 vacuum sealed bags wrapped in black electrical tape concealed inside a stuffed animal wrapped in clear bubble wrap.

8. On July 5, 2021, beginning at approximately 2:47 a.m., HALL and LYNN engaged in the following series of iMessages:

<b><i>Party</i></b>	<b><i>Date/Time (EDT)</i></b>	<b><i>Message</i></b>
HALL	July 5, 2021 2:47 a.m.	Yo

HALL	July 5, 2021 2:48 a.m.	[Photo of a clear baggie containing blue circular tablets on a digital scale reading 107.3g]
HALL	July 5, 2021 2:48 a.m.	Same difference that's 4 bands (\$4,000) wit you
LYNN	July 5, 2021 2:49 a.m.	Wym cuz
LYNN	July 5, 2021 2:49 a.m.	Oh yea
HALL	July 5, 2021 2:49 a.m.	[Photo of a clear baggie containing blue circular tablets on a digital scale reading 92.3g with another baggie containing blue circular tablets in the background]
HALL	July 5, 2021 2:49 a.m.	This one dumb short (of fentanyl pills)
HALL	July 5, 2021 2:49 a.m.	Damn
LYNN	July 5, 2021 2:49 a.m.	4 g'a (\$4,000)
LYNN	July 5, 2021 2:49 a.m.	Damn
LYNN	July 5, 2021 2:49 a.m.	Ok
HALL	July 5, 2021 2:49 a.m.	Yeah that's from both but bet I just got in
LYNN	July 5, 2021 2:49 a.m.	Add it all up Cuzzin
LYNN	July 5, 2021 2:50 a.m.	That's how they came
LYNN	July 5, 2021 2:50 a.m.	You already kno that 275
LYNN	July 5, 2021 2:50 a.m.	Plus whatever else
HALL	July 5, 2021 2:52 a.m.	50 g (50 grams) missing
LYNN	July 5, 2021 2:54 a.m.	Never
HALL	July 5, 2021 2:55 a.m.	That's 40 a bag dead n****s we left right out
LYNN	July 5, 2021 2:55 a.m.	50 cuz fr
LYNN	July 5, 2021 2:55 a.m.	Ok
LYNN	July 5, 2021 2:55 a.m.	It's coming from them anyway
LYNN	July 5, 2021 2:56 a.m.	I kno you ain't lien (lying)
HALL	July 5, 2021 10:03 a.m.	[100 emoji]
LYNN	July 5, 2021 11:14 a.m.	Cuz
HALL	July 5, 2021 12:18 p.m.	Yeah

9. On November 2, 2021, at approximately 6:08 p.m., LYNN and DARIUS RICHARD spoke on the telephone. During the conversation, LYNN stated, "Huh? Yeah, I gotta play, I was gonna let through hit the big, bro." RICHARD then said, "Damn bro." LYNN then said, "It's cool. I [Unintelligible] hit it out, I just hit it and then is for four hundred (400 fentanyl pills), a hundred (100 fentanyl pills), I just had to give you the cash, you just give me the pills

back." RICHARD then stated, "Oh, that's cool." LYNN responded, "Yeah, 'cause I'm about to hit the number (make a profit)." RICHARD then said, "A'right."

10. On November 3, 2021, at approximately 10:29 a.m., LYNN and MICHAEL TAYLOR spoke on the telephone. After initial greetings, LYNN stated, "I'm about to leave out the motherf\*\*\*ing house right now, I'm tired as f\*\*\*, I got come grab your bread (money), grab Deezy bread and then I'm only going to be like 20 minutes, bruh." TAYLOR replied, "Man, you got (Unintelligible) ..." LYNN then stated to TAYLOR, "...Call me too cause tomorrow I had be like bro you got to give me 3 and a quarter (\$3,250) you wouldn't have no understanding that n\*\*\*\* about to leave, I swear to god he said 11 o'clock." TAYLOR then replied, "A'ight look, you gonna have come to me though (provide the fentanyl pills), so I can't come outside today." LYNN then stated, "It's cool, bro. I got you (will bring and sell the fentanyl pills), bro. Send me where you at. Yeah, it's cool, bro. Just send me where you at."

11. On November 3, 2021, at approximately 10:30 a.m., LYNN and TAYLOR spoke on the telephone. TAYLOR stated to LYNN, "(Call already in progress)... the dark ones (fentanyl pills)." LYNN then asked TAYLOR, "Mm, which dark ones (fentanyl pills)?" TAYLOR then replied to LYNN, "You know like they like the one kind of blue or the light, you got the light light ones (fentanyl pills)?" LYNN then said, "I don't know, bruh them b\*\*\*\*es like both colors for real. But you ain't seen the ones that that we had floatin' around like the last two days? From YB." TAYLOR then said, "Man nah, I ain't seen 'em. But they, I hope that they ain't no dusty ones (fentanyl pills) is they?" LYNN then replied, "Nah, the dusty ones is the lighter ones, right?" TAYLOR then stated, "Yeah, them ones." LYNN then said, "They ain't no dusty ones, they like kinda darker than the ones we been havin'." TAYLOR then replied, "Oh awe yeah, a'right." LYNN then stated, "They ain't dark but they darker than the ones we been

havin' tho'. Did they they payin' out tho' (customers are buying them)." TAYLOR then said, "...yeah." LYNN then said, "They payin' out tho'." TAYLOR then asked, "They ain't dusty or nothin' though is they?" LYNN then replied, "No, hell no." TAYLOR stated, "A'right." LYNN then said, "A'right. If you don't want um, I'll buy those b\*\*\*\*es (fentanyl pills) back from you." TAYLOR replied, "No, it's cool, just go ahead, you said it's gonna take you twenty minutes to bring them?" LYNN then stated, "Yup."

12. On November 3, 2021, at approximately 12:17 p.m., LYNN and TAYLOR spoke on the telephone. After initial greetings TAYLOR stated, "I'm right, I'm right here, bruh." LYNN asked, "In this black car?" TAYLOR then replied, "Yeah."

13. On November 3, 2021, at approximately 2:26 p.m., LYNN and RICHARD spoke on the telephone. After initial greetings RICHARD asked, "Can you grab um... I got a play (narcotics deal) um can you grab um that seven-fifty (750 fentanyl pills) for him ." LYNN replied, "Seven?" RICHARD replied, "Yeah". LYNN then said, "Yeah, I could bruh. I give him (Unintelligible). Nah, this the one I go to right here. I (Unintelligible) that s\*\*\* right there, they spot right there. I wasn't even gonna pull to that one, I just stopped. Okay, could you give me like um twenty." RICHARD then said, "Damn, take your time, fool! Ain't no rush, I'm just sayin' I got a play at his. He gon' come like after four. So, I ain't rushin' you or none of that. So, don't think I'm rushin' you." LYNN then said, "Yes sir (Unintelligible) that's your s\*\*\* (narcotics)." RICHARD then stated, "Uh... He um, he um only reason I say that 'cause I ain't wanna go get them b\*\*\*\*es (fentanyl pills) from Isaiah (CARSON). You know how he is." LYNN then said, "Bruh it's cool, it's cool, bruh. You ain't gotta, they yours, bro. So s\*\*\*, bruh, hold up, hold up real quick, bruh." RICHARD responded, "A"ight."

14. On November 3, 2021, at approximately 3:38 p.m., LYNN and ALEXIS SHORT spoke on telephone. After the initial greeting, SHORT stated, "Oh no, Head (TAMAR EVANS) had called you." LYNN replied, "Head (EVANS) called? He said what?" SHORT then said, "He (EVANS) needed four hundred (400 fentanyl pills)." LYNN then said, "Huh?" SHORT then stated, "I said he (EVANS) needed four hundred (400 fentanyl pills)." LYNN asked, "He needed four hundred (400 fentanyl pills)?" SHORT then said, "Yeah, I just gave it to him (EVANS)." LYNN then said, "Oh, you counted it out?" SHORT replied, "Yes." LYNN then said, "A'right that's cool. He'll (EVANS) bring you the money back."

15. On November 3, 2021, at approximately 4:56 p.m., while LYNN spoke on the telephone a background conversation took place between LYNN and SHORT. LYNN stated, "It doesn't even matter, I told you to come here like five times. The f\*\*\*... What happened to that other lil' bag that was right there? He (EVANS) needed that with the four hundred (400 fentanyl pills)? So it was short of four hundred (400 fentanyl pills) so you had to make it four hundred (400 fentanyl pills)? The lil' baggie." SHORT replied, "(Inaudible)." LYNN then said, "Right, that was the lil' bag. It was more than, it was more than forty-four hundred (4,400 pills) in that (Unintelligible)." SHORT then stated, "It wasn't." LYNN then asked SHORT, "How many was in the lil' bag?" SHORT responded, "It was only the eight left." LYNN then stated, "In the lil' bag." SHORT replied, "(Inaudible) just counted four hundred." LYNN responded, "I'm sayin', in the lil' bag how many was left?"

16. On November 5, 2021, at approximately 6:01 p.m., LYNN and TAYLOR spoke on the telephone. After initial greetings TAYLOR stated, "Oh na! My bad. 'Cause I ain't got the, I saved your number, what I was 'bouta say? Man, I got somebody that's tryina' buy buy a thousand (1,000 fentanyl pills) too, man." LYNN then replied, "Gotta put your lil', we gotta, it

ain't gonna be the same thing till like um Sunday, bruh. I told you he gone." TAYLOR then said, "That's cool 'cause I ain't tryina', you know it's my uncle, man." LYNN then stated, "Whatchu' gonna, I mean tell him somethin' where it's gonna be cool for you. You still make you a lil' (Unintelligible)." TAYLOR then said, "Yeah, I'm gonna go tell him, I'mma tell him, like man, three dollars (\$3.00 per pill) 'cause the people ain't up here, man. 'Cause I already told them like they don't be chargin' them n\*\*\*\*..." LYNN then said, "(Unintelligible), bruh. 'Cause I'mma charge you like three (\$3.00 per pill), three twenty-five (\$3.25 per pill) right now, bruh."

TAYLOR then said, "Uh, I'll wait till Sunday bruh then, I ain't trippin'."

17. On November 6, 2021, at approximately 10:20 p.m., LYNN and SHORT spoke on the telephone. After initial greetings LYNN asked, "You got my gun in your bag?" SHORT replied, "No. Mine in the car." LYNN then asked, "You still in the house?" SHORT replied, "Yeah." LYNN then said, "Alright, I'll give it back to you. I'm probably 'bout to park my car down there (Unintelligible) get yours, man my brakes are (Unintelligible)."

18. On November 9, 2021, at approximately 3:33 p.m., TERRY MATTHEWS and LYNN spoke on the telephone. LYNN said, "Bro, you coulda' just gave me the address. You coulda' just put it on the porch, bruh. I only got the [Unintelligible] call. I ain't even look in there, I think I texted you when you had said that." Later in the call, LYNN said, "She said she gonna come right back over, that's why I was tryina', she was tryina', that's what I was tryina' see before she had left but [Yawns] she said she had to go. [Yawns] I told her to just go ahead." MATTHEWS replied, "Bruh, it's the house with the wood, with the wooden porch on there." Later in the call, LYNN said, "S\*\*\*, I ain't doin' nothin', man. I'm 'bouta um, I'm waitin' for this man to tow this car, man. Um, gettin' my brakes fixed and s\*\*\*. I'm out here doin' my brakes and s\*\*\*. I ain't doin' nothin'. I'll try to bump into you later on. I got them b\*\*\*\*es

(fentanyl pills) for you." MATTHEWS replied, "You come on, bro?" LYNN responded, "I said, I got them b\*\*\*\*es (fentanyl pills) for you. I'mma try to bump into you later on."

19. On November 10, 2021, at approximately 12:33 p.m., LYNN and TAMAR EVANS spoke on the telephone. During the call, LYNN said, "[Overtalk] N\*\*\*\*, if you called and listened. You call me checking me? I ain't even say nothing, bruh." EVANS replied, "I called your ....[crosstalk]" LYNN said, "Head! (EVANS!) [Crosstalk] It ain't nothing, Head! (EVANS!)" EVANS replied, "The only thing I could do is call... [Crosstalk]" LYNN said, "Bruh... [Crosstalk]" EVANS replied, "...money from nothing, b\*\*\*\*. [Crosstalk] All you had to do was call." LYNN said, "Big bruh, please. I didn't say nothing, Head (EVANS). I called you. You didn't answer. I said, bruh. Ask and you said it wasn't going to be..." EVANS replied, "Bruh, I am...[Crosstalk]" LYNN said, "I said, 'Just let me know.' Big bruh, just hear me. I text you in compliance. I said 'Bruh, I don't want to be a hassle, so just let me know.' I told you I needed you. That's all I said. You called me with an attitude as soon as I... [Crosstalk]" EVANS replied, "Charlie (LYNN), I ain't got no attitude. 'Cause you talking about not being a problem. B\*\*\*\*, you always a problem, Charlie (LYNN). Even when you don't want to be a problem... [Crosstalk]" LYNN said, "Hey, listen. I don't benefit off none of you n\*\*\*\*s. So me being a problem to anybody. I'm elite, n\*\*\*\*. F\*\*\* is you talking about. You benefit off me, n\*\*\*\*. I don't make s\*\*\* off of you. You hit some plays in [unintelligible]. You don't have to do s\*\*\* for me, n\*\*\*\*. Ima a be straight. Who the f\*\*\* I benefit off of, n\*\*\*\*? [Crosstalk] What plays you got for me to get in? What plays? Could I buy a house? Or a f\*\*\*ing truck, n\*\*\*\*?" Later in the conversation, LYNN said, "Everybody over here make money off me. I don't make money off nobody."

20. On November 13, 2021, at approximately 2:45 p.m., LYNN and SHORT spoke on the telephone. During the call, LYNN said, "Hey. I need you to count out um, a thousand (1,000 fentanyl pills) for me. You hear me?" SHORT responded, "Yeah." LYNN then said, "Not them thousand (1,000 fentanyl pills) that's on there 'cause, what I brought in a thousand the other day, they lighter than the other ones, and then there's another two, fifty (250 fentanyl pills) in that bag that uh, exotic bag. Not them though, not them ones. Not the lighter ones, the darker ones. But I don't think I got no dark ones out, so I think you might have to grab a thousand of the darker ones. Need to make like ten thousand a day (\$10,000). This phone about to be off too. Oh! Go get my phone. Can you do that?" SHORT then replied, "Yeah."

21. On November 13, 2021, beginning at approximately 10:11 p.m., LYNN and EVANS exchanged a series of iMessages. At 10:11 p.m., EVANS asked "WYD (what are you doing)[]" LYNN replied, "S\*\*\* watching the cavs (Cleveland Cavaliers)[]." EVANS then said, "You said if i wanted I can pay 2.30 (\$2.30 per pill)[]." LYNN replied, "2.80 (\$2.80 per pill)[]." EVANS then said, "2.50 (\$2.50 per pill)."

22. On November 15, 2021, beginning at approximately 3:42 p.m., MATTHEWS and LYNN engaged in the following series of iMessages:

<b>Party</b>	<b>Date/Time (EDT)</b>	<b>Message</b>
LYNN	November 15, 2021 3:42 p.m.	Jail call
MATTHEWS	November 15, 2021 3:43 p.m.	Call me back asap Bruh I need them blues (fentanyl pills) and I just got out [face palm emoji]
MATTHEWS	November 15, 2021 3:47 p.m.	Can I bump into you my people down here now?
MATTHEWS	November 15, 2021 3:55 p.m.	Just say yes or no Bruh so I don't have them waiting for nothing
LYNN	November 15, 2021 3:58 p.m.	Bra hold on I'm on a jail call ima call you
LYNN	November 15, 2021 4:22 p.m.	Wya
MATTHEWS	November 15, 2021 4:31 p.m.	On Lee

23. On November 16, 2021, at approximately 3:16 p.m., LYNN called DAJUAN GRANT on the telephone. During the call, LYNN said, “[Aside: Huh?] You ready bruh? I need you to be ready. And I need you ‘cause [stutters] I’m trynna grab everything (fentanyl pills) this n\*\*\*\* got on him, man.” GRANT replied, “He (JAMIE ENGLAND) got some s\*\*\* (fentanyl pills) up here?” LYNN then said, “Yeah! He gots-he got like fifty (50,000 fentanyl pills) up here, bruh. I’m trynna buy all them b\*\*\*\*es (fentanyl pills), no cap. Trynna buy... I’m trynna buy ‘em all. See, my thing is my n\*\*\*\*. N\*\*\*\* goin’... my n\*\*\*\* (EVANS) goin’ buy fifteen (15,000 fentanyl pills) then, you feel me? Then I was gonna have you buy ten (10,000 fentanyl pills) and then I was gonna buy the other twenty-five (25,000 fentanyl pills).” GRANT replied, “A’ight so look, this why I was saying, you goin’ let me, I’m saying b\*\*\*\*, you ‘bout-let me get the whole whats-the-name this time, b\*\*\*\*” LYNN then said, “What? What, the whole what, bruh? [Stutters] The whole....” GRANT then said, “[Unintelligible] want me to buy ten (10,000 fentanyl pills). Huh?” LYNN then said, “I want you to buy ten (10,000 fentanyl pills) right now, a’ight?” GRANT then said, “Ten-thousand of ‘em? Yeah, but what’s the – [Unintelligible]” LYNN then said, “I ‘on’t got enough-I mean I got the cash but it’s like... when I put cash in my sister house, bruh I don’t like diggin’ in it. So, like... I got like thirty racks (\$30,000) in a spot. My n\*\*\*\* goin’ buy um... I’ll probably make another ten, fifteen thousand (\$10-15,000) by-by the next day or two. But I’m trynna get with him tomorrow. My n\*\*\*\* gonna buy... I don’t know if you know Head (EVANS), but Head (EVANS) gonna buy like fifteen-thousand (15,000 fentanyl pills). Then I was gonna have you buy ten (10,000 fentanyl pills), then honestly burh-on some real n\*\*\*\* s\*\*\*-I wasn’t even gonna buy the whole twenty-five (25,000 fentanyl pills).” LYNN then said, “I was gonna buy like seventeen (17,000 fentanyl pills) and owe him for eight (8,000 fentanyl pills).” [UM in Background: One second man.] LYNN then said, “Reason being

Ty (GRANT) ... reason being thought, Ty (GRANT), cause, like s\*\*\*, why would I pay for fifty-thousand (50,000 fentanyl pills) when all them b\*\*\*\*es might be short fifty (50 pills) a piece. That's goin' average out to five-thousand (5,000 fentanyl pills) short. You feel me? I'm just gonna buy a -n\*\*\*\*—I'm just gonna buy a cool motherf\*\*\*in' forty-thousand (40,000 fentanyl pills) and let him give me the other ten (10,000 fentanyl pills). You know what I'm saying? Therefore, if n\*\*\*\* s\*\*\* short I already got y'all s\*\*\* cause I already owe him, you know what I'm saying? S\*\*\* like that."

24. Later in the same conversation, LYNN said, "Hello?" GRANT replied, "Yeah." LYNN then said, "Yeah." GRANT then said, "Can you hear me?" LYNN then said, "Yeah bruh." GRANT then said, "Oh, so when you trynna pull up on dude (ENGLAND), tomorrow?" LYNN then said, "Yessir. I'm trynna get all this s\*\*\* ready today. You feel me? Have you and Head (EVANS) ready for today and I'll pull up on him tomorrow. But my thing is though, bruh, he say he got fifty (50,000 fentanyl pills) left. I'm not goin' cash out on a whole fifty (50,000 fentanyl pills), Ty (GRANT). They can be short fifty every thousand and [Stutters] that'll average to, you feel me ..." GRANT then said, "Yeah." LYNN then said, "Five-thousand (5,000 fentanyl pills) an' short so I'm like, 'S\*\*\* you got fifty (50,000 fentanyl pills)? Imma just buy like forty-thousand (40,000 fentanyl pills) of 'em.' GRANT then said, "Yeah, that's what I was 'bout to say."

25. On November 16, 2021, at approximately 4:55 p.m., LYNN received an incoming call from GRANT. During the conversation, LYNN said, "They think everything's for us, bro. I'm just tryna', I just gotta, drop a few things out real quick. Uh... call my n\*\*\*\*, my n\*\*\*\* was ready today but I wasn't about to have everybody ready, like I coulda' had y'all ready today, but I wasn't about a' rush and do s\*\*\*. N\*\*\*\*, this s\*\*\* on my time." GRANT replied, "That's

your problem, b\*\*\*\*." LYNN then said, "Nah n\*\*\*\*, I'm on [Unintelligible] time, n\*\*\*\*'s don't [Unintelligible]." GRANT then said, "No, I'm talkin' s\*\*\*, man." LYNN then said, "I was about a' say, this how you want me to move, bro. S\*\*\*, I wasn't about a', Ty (GRANT), bruh. I need you by ten." GRANT then said, "When?" LYNN then said, "Right now! It's gonna be like bruh, what the f\*\*\*, bruh? Bruh, you feel me? No n\*\*\*\*, this s\*\*\* on my time, n\*\*\*\*. He wanted to do it today, I told him. 'N\*\*\*\*, tomorrow. What the f\*\*\*? I gotta count cheese (money). I gotta get with Ty (GRANT), I still had to make sure you was wit' it. You feel me, all type of s\*\*\*, n\*\*\*\*. I'm not abouta' be rushin' for nobody else and crash out, n\*\*\*\*." GRANT then said, "Hell nah..." LYNN then said, "I'm not rushin' for nobody, bruh. That's why I be takin' my time, that's why I do it how the f\*\*\* I want 'cause guess what, yeah a n\*\*\*\* can say whatever but it's gonna keep me free, cuz."

26. On November 16, 2021 at approximately 5:37 p.m., GRANT sent a SMS text to LYNN which read, "What time you linking with bra so I know when to tell ZEEK (ISAIAH CARSON) to grab the ends (money) out the bank[.]" GRANT followed with another SMS text which read, "I'm on the phone with zeek (CARSON) now." At approximately 5:39 p.m., LYNN sent a SMS text to GRANT which read, "Ima get with him (ENGLAND) at like 12 so I'll try to get with zeek (CARSON) by 10:30."

27. On November 17, 2021, at approximately 12:07 p.m., LYNN called ISAIAH CARSON. During the call, CARSON said, "Hello?" LYNN replied, "Yeah, I'm glad you gave it to us 'cause this n\*\*\*\* ... I don't want him be [Unintelligible] that much in our business anyways. Cause Ty (GRANT) called me like a hour ago, I had went back to sleep burh... but I woke up, I'm like let me call this n\*\*\*\* Zeek (CARSON). I called Ty (GRANT), his phone went to voice mail, but I already know, you know what's going on. I know he (GRANT) told you

yesterday, but... [Unintelligible]" CARSON then said, "Yeah I'm like, man, man that n\*\*\*\*\*(GRANT) text me." LYNN then said, "Huh?" CARSON then said, "Like—that n\*\*\*\*\*(GRANT) text me like... uh...uh... call meaning like... uh... wait 'til you hear from me before you make any moves or something, or get cornered. Like, what's up. [Unintelligible]" LYNN then said, "He (GRANT) said what?" CARSON then said, "He told me to wait 'til he hear something or something." Later in the conversation, LYNN said, "Cause bruh this n\*\*\*\* blowin' my line right now. He's facetimeing me—the plug (ENGLAND) is facetimeing me right now. I gotta take this n\*\*\*\* seventy racks (\$70,000.00). I'm like bruh, "You goin' have your s\*\*\* (fentanyl pills) ready?" He like, 'Yeah, Zeek (CARSON) ready now.' I'm like, 'Alright, well, we ain't gotta do it now. We goin' do it tomorrow.' He's (GRANT) like, 'You already know what's going on.' [Unintelligible] s\*\*\* like that." CARSON then said, "Hold on, let me see. Alright, he said..." LYNN then said, "Right not-but he-he hung up." CARSON then said, "Yeah-yup that's what it say. It say, it say uh... hold on to the money 'til... 'til bruh, 'til you hear from me. Here we go. Hold on. Hold on."

28. On November 17, 2021, at approximately 12:51 p.m., LYNN called ZAILY MARTINEZ-NAVARRO. After initial greetings, later in the conversation, LYNN said, "A'right, I'mma call you back 'cause I might need you to um, I might need you to meet me somewhere with some bread (money)." MARTINEZ-NAVARRO then said, "A'right, well make sure you call before one, thirty- that's when I'mma leave out." LYNN then said, "Call me back before you leave out. I know for a fact I'mma need you to grab it." MARTINEZ-NAVARRO then said, "Okay."

29. On November 17, 2021, at approximately 2:13 p.m., LYNN called MARTINEZ NAVARRO. During the conversation, MARTINEZ-NAVARRO said, "I had to count it (the

money) out." LYNN replied, "Baby, you got blues and all type of s\*\*\*, that s\*\*\* don't take that long to count that s\*\*\* out take it, baby you do that s\*\*\* now. It's ain't nothin' but blues and reds in there." MARTINEZ-NAVARRO then said, "[Unintelligible]." LYNN then said, "I'm just sayin', man, I'm not trippin'. I'm just sayin', baby, nah you ain't gotta, you ain't gotta, you ain't gotta cancel your s\*\*\*, it's cool. I'm comin' to you. I'm comin' to you, baby. My line clickin', baby. I'm not trippin'. Or just hold on, hold on, baby."

30. On November 17, 2021, at approximately 2:54 p.m., LYNN called CARSON. CARSON answered, "Hello?" LYNN replied, "Yeah, I don't even see you." CARSON then said, "[Unintelligible]" LYNN then said, "Oh, you in the Buick?" CARSON then said, "Yeah..." LYNN then said, "A'ight" CARSON then said, "A'ight."

31. On November 17, 2021, at approximately 2:54 p.m., at the Kentucky Fried Chicken, 260xx Euclid Ave, Euclid, Ohio, LYNN exited his black Audi, entered the passenger seat of a white Buick, quickly exited the white Buick, returned to the black Audi, and drove from the area.

32. On November 17, 2021, at approximately 2:59 p.m., ZAILY MARTINEZ-NAVARRO called LYNN. After initial greetings, LYNN said, "Go right there somewhere and get some food...somewhere. Panera right there get some food from there. Prolly be like ten minutes, I'm 'bouta swing right past you, I got this n\*\*\*, Head, (EVANS) waitin' and s\*\*\*."

33. On November 17, 2021, at approximately 4:03 p.m., LYNN, driving a black Audi, departed 25xx Kemper Road, Shaker Heights, Ohio.

34. On November 17, 2021, at approximately 4:10 p.m., LYNN, driving a black Audi, arrived at the Church Square shopping plaza, East 79th Street and Euclid Avenue, Cleveland, Ohio.

35. On November 17, 2021, at approximately 4:11 p.m., LYNN called MARTINEZ-NAVARRO. After a brief conversation regarding their locations, LYNN said, "Alright I'm um... I'm in Church Square, hold on."

36. On November 17, 2021, at approximately 4:15 p.m., LYNN exited the black Audi and approached MARTINEZ-NAVARRO's BMW. LYNN then reached into the BMW and retrieved a brown bag.

37. On November 17, 2021, at approximately 4:19 p.m., MARTINEZ-NAVARRO called LYNN. MARTINEZ-NAVARRO said, "Get back in your car." LYNN replied, "Hello? Yeah, what's up, baby? I'm on the phone. You callin' s\*\*\*, baby, what's up? MARTINEZ-NAVARRO then said, "No, you just standing outside." LYNN then said, "Man, don't start that s\*\*\*. I was waiting on brother an' 'em to pull up. I'm on my other phone you call three times. I can't even talk on my phone. This why I be so aggravated. I can't even talk on my phone without you callin' me like, "Why you this? Why you that?" Just let me breathe. It don't matter. I was waiting on them to pull up. Let me breathe, man!" MARTINEZ-NAVARRO then said, "[Unintelligible]" LYNN then said, "Okay! Man, I'll call you back, my plug (ENGLAND) calling now, man."

38. On November 17, 2021, at approximately 4:21 p.m., LYNN called MARTINEZ-NAVARRO. MARTINEZ-NAVARRO answered, "They [Unintelligible] I didn't wanna-I don't wanna argue [Unintelligible]." LYNN replied, "I could tell you is, you sayin' why I was standing outside. I just told you bruh, brother 'bout to follow me." MARTINEZ-NAVARRO then said, "you need to go get money. What?" LYNN then said, "Baby, this is my ghetto, I'm telling you lil bruh and 'em about to follow me. They was pullin' up, they was callin' me like. "Where you at?" I'm like, "I'm outside dog." Then Tray V call me, I'm on the phone with Tray

V. I didn't even answer they call. They call back. I'm outside so they can see me, I'm on the phone with Tray V talkin' 'bout my video shoot. You callin', I ain't answer, you call back again, I answer, "What's up?" Why you standing outside?" Man, Zaily, come on, baby, like... come on, man, You can't help yourself." MARTINEZ-NAVARRO then said, "You always think I'm on bulls\*\*\*. I'm just saying what [Unintelligible] that's it." LYNN then said, "[Unintelligible] I'm outside. Man, who would?" MARTINEZ-NAVARRO then said, "Okay. Alright." LYNN then said, "Man, what? Waiting outside for fifteen racks (\$15,000.00)." MARTINEZ-NAVARRO then said, "Alright."

39. On November 17, 2021, at approximately 4:35 p.m., LYNN, driving the black Audi, departed the Church Square shopping plaza, East 79th Street and Euclid Avenue, Cleveland, Ohio.

40. On November 17, 2021, at approximately 5:40 p.m., LYNN, driving the black Audi, returned to the Church Square shopping plaza, East 79th Street and Euclid Avenue, Cleveland, Ohio and parked.

41. On November 17, 2021, at approximately 5:41 p.m., GRANT called LYNN. LYNN answered, "Nineteen (\$19,000)... Twenty (\$20,000)...I'm getting it together right now, bruh." GRANT replied, "Oh I-Iwas-I wasn't 'bout to say that." LYNN then said, "[Unintelligible]" GRANT then said, "Alright, well look, I was 'bout to ask you something else. Uh just call me when you get done." LYNN then said, "Twenty-three (\$23,000)...alright bet bruh." GRANT then said, "Alright." LYNN then said, "Twenty-four...(\$24,000)"

42. On November 17, 2021, at approximately 5:41 p.m., JAIME ENGLAND arrived in a black Mazda at Church Square shopping plaza, East 79th Street and Euclid Avenue, Cleveland, Ohio and then entered LYNN's black Audi.

43. On November 17, 2021, at approximately 6:04 p.m., ENGLAND exited the front passenger seat of LYNN's black Audi carrying the brown paper bag retrieved from MARTINEZ-NAVARRO's BWM and walked toward and reentered the black Mazda. LYNN, driving the black Audi, then departed the area and drove directly to 25xx Kemper Road, Shaker Heights, Ohio.

44. On November 17, 2021, at approximately 6:15 p.m., ENGLAND entered the DTLR Clothing Store, 79xx Euclid Avenue, Cleveland, Ohio.

45. On November 17, 2021, at approximately 6:30 p.m., ENGLAND exited the DTLR Clothing Store, re-entered the black Mazda, departed the area, and drove to 14xx East 51<sup>st</sup> Street, Cleveland, Ohio.

46. On November 17, 2021, at approximately 6:35 p.m., at 25xx Kemper Road, Apartment 217, Shaker Heights, Ohio, LYNN escaped arrest after LYNN broke a second-floor window and fell into the parking lot of the apartment complex.

47. On November 17, 2021, at approximately 8:15 p.m., law enforcement arrested LYNN after he fled to 277xx Westchester Parkway Apt A, Westlake, Ohio.

48. On November 17, 2021, at 25xx Kemper Road, Apartment 217, Shaker Heights, Ohio, LYNN, SHORT, and EVANS possessed with the intent to distribute approximately 40,000 counterfeit fentanyl pills branded as 30 milligram oxycodone pills. LYNN, SHORT, and EVANS also possessed \$23,060.00 in U.S. currency, a box of Federal Premium 9mm ammunition, containing 11 hollow point type rounds, a box of Viking 9mm ammunition, containing 18 full metal jacket type rounds, and a loaded Sig Sauer P365 handgun, serial number 66A924750, with eight rounds in the magazine and one round in the chamber.

49. On November 17, 2021, at 14xx E.51<sup>st</sup> St., Cleveland, Ohio, ENGLAND possessed with the intent to distribute 2,585 grams of methamphetamine and one counterfeit fentanyl pills branded as 30 milligram oxycodone pill. ENGLAND also possessed \$20,700.00 in U.S. currency, a Springfield Armory .45ACP 1911 pistol, serial number N328702, loaded with 7 rounds, a Springfield Armory extended magazine loaded with 16 .45ACP rounds, and a DTLR clothing store bag containing a wallet with ENGLAND's Arizona driver's license.

50. On November 17, 2021, at 277xx Westchester Pkwy #A, Westlake, Ohio, LYNN and MARTINEZ-NAVARRO possessed \$16,314.00 in U.S. currency, a silver and blue Rolex watch, and a gold chain.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Possession with Intent to Distribute Fentanyl, 21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

The Grand Jury further charges:

51. On or about November 17, 2021, in the Northern District of Ohio, Eastern Division, Defendant CHARLES LYNN, aka CHARLIE, aka CHARLIE HUSTLE, did knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT 3

(Possession with Intent to Distribute Methamphetamine, 21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

The Grand Jury further charges:

52. On or about November 17, 2021, in the Northern District of Ohio, Eastern Division, Defendant JAIME ENGLAND did knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of

methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNTS 4-13

(Use of a Communications Facility to Facilitate a Felony Drug Offense, 21 U.S.C. § 843(b))

The Grand Jury further charges:

53. On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, the Defendants listed below did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Sections 846 and 841(a)(1):

Counts	Defendants	Date	Time (EST)
4	CHARLES LYNN, aka CHARLIE, aka CHARLIE HUSTLE	November 16, 2021	3:16 p.m.
5	DAJUAN GRANT, aka TY, aka TYG	November 16, 2021	3:16 p.m.
6	ISAIAH CARSON, aka ZEEK	November 17, 2021	12:07 p.m.
7	ZAILY MARTINEZ-NAVARRO	November 17, 2021	2:13 p.m.
8	ALEXIS SHORT	November 3, 2021	3:38 p.m.
9	TAMAR EVANS, aka HEAD	November 13, 2021	10:11 p.m.
10	DARIUS RICHARD	November 3, 2021	2:26 p.m.
11	MICHAEL TAYLOR	November 3, 2021	10:30 a.m.
12	TERRY MATTHEWS	November 9, 2021	2:48 a.m.
13	TY MAREJRYC GEFFERI KEMAR HALL	July 5, 2021	2:48 a.m.

FORFEITURE

The Grand Jury further charges:

54. The allegations of Counts 1 through 13, inclusive, are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853. As a result of the foregoing offenses, Defendants CHARLES LYNN, aka CHARLIE, aka CHARLIE HUSTLE; JAIME ENGLAND; DAJUAN GRANT, aka TY, aka TYG; ISAIAH CARSON, aka ZEEK; ZAILY MARTINEZ-

NAVARRO; ALEXIS SHORT; TAMAR EVANS, aka HEAD; DARIUS RICHARD; MICHAEL TAYLOR; TERRY MATTHEWS; and TY MAREJRYC GEFFERI KEMAR HALL shall forfeit to the United States, any and all property constituting, or derived from, proceeds they obtained, directly or indirectly, as the result of such offenses; and any and all of their property used - or intended to be used - in any manner or part, to commit or to facilitate the commission of the such offenses; including, but not limited to, the following:

- a. \$19,960.00 in U.S. currency seized from ALEXIS SHORT on November 17, 2021;
- b. \$3,200.00 in U.S. currency seized from ALEXIS SHORT on November 17, 2021;
- c. a loaded Sig Sauer P365 handgun, serial number 66A924750, with magazines and ammunition seized from ALEXIS SHORT on November 17, 2021;
- d. Miscellaneous ammunition seized from ALEXIS SHORT on November 17, 2021;
- e. \$20,700.00 in U.S. currency seized from JAIME ENGLAND on November 17, 2021;
- f. a Springfield Armory .45ACP 1911 pistol, serial number N328702, with magazines and ammunition seized from JAIME ENGLAND on November 17, 2021; and
- g. \$16,314.00 in U.S. currency, seized from CHARLES LYNN and ZAILY MARTINEZ-NAVARRO on November 17, 2021.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.